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Presentment Date: July 10, 2018 12:00 PM

Objection Date: July 3, 2018

*Attorneys for David Shapiro Nominee 2 and David
Shapiro, individually and as president and nominee of
David Shapiro Nominee 2*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DAVID SHAPIRO NOMINEE 2 and DAVID
SHAPIRO, individually and as president and nominee
of David Shapiro Nominee 2,

Defendants.

Adv. Pro. No. 10-04325 (SMB)

**NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application to Withdraw as Counsel, dated June 19, 2018 Chaitman LLP, attorney of record for Defendants David Shapiro Nominee 2 and David Shapiro, individually and as president and nominee of David Shapiro Nominee 2 (the “Defendants”), will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on July 10, 2018 at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party’s obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: June 19, 2018
New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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